



REY PEREZ
ASSISTANT VICE PRESIDENT
CORPORATE COUNSEL

November 28, 2011

Kenneth G. Hill
Acting Bureau Chief
California Department of Insurance
Market Conduct Division
Field Rating and Underwriting Bureau
45 Freemont Street, 22nd Floor
San Francisco, CA 94105

VIA FEDERAL EXPRESS

*RE: Final and Adopted Market Conduct Examination Report – Format 12938
National Western Life Insurance Company, NAIC #66850*

Dear Mr. Hill:

Pursuant to your correspondence dated November 2, 2011, please accept this letter as National Western's response to the contents of the above referenced report.

The Company would note that the statement required by CCR 2695.7(b)(3) was not included in one claims denial letter, and as such it is not an unfair practice under CIC Section 790.03(h)(3) because it was not done with such frequency as to indicate a general business practice on the part of the Company.

As always, we thank the Department for its time and consideration, and I ask that you not hesitate to contact me if you have any questions or if I may be of further assistance.

Sincerely,



Rey Perez

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